

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA
Case 1:19-cr-00018-ABJ**

UNITED STATES OF AMERICA,

v.

ROGER J. STONE, JR.,

Defendant.

_____ /

DEFENDANT ROGER J. STONE'S PROPOSED SPECIAL JURY INSTRUCTION

Defendant Roger J. Stone, Jr. files this proposed special jury instruction.

When considering the word intermediary, you must apply the following definition:

“Generally, an intermediary acts as a middleman, a broker, one who is employed to negotiate a matter between two parties, and who for that purpose may be [an] agent of both.”

Black's Law Dictionary 731 (5th ed.1979).

First Ins. Funding Corp. v. Fed. Ins. Co., 284 F.3d 799, 805 (7th Cir. 2002).

Respectfully submitted,

By: /s/_____

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CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2019, I electronically filed the foregoing with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached service list in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notice of Electronic filing.

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